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December 14, 2006

VIA TELEFAX (205) 678-0000

Kate Hortberg
 Boardman, Carr, Weed & Hutcheson, P.C.
 400 Boardman Drive
 Chelsea, Alabama 35043-8211

RE: A.G., et al. v. Autauga County Board of Education

Dear Kate:

I am in receipt of your faxed letter dated December 13, 2006.

I have enclosed a sample of a search done on my computer, which lists the document number and the date the document was modified.

Because of the type of software my firm uses, each document is assigned a number instead of a title or name. Also, with the search results/index, I would like to also know the date that the document was created, which can be shown on a printout, but is not shown on this printout.

Further, even though I mentioned that for now we would only like to see an index of the files on the computers listed in the discovery. I have not ruled out the fact of requesting the computers if the need arises.

With respect to the *Ford Motor Company* case, which you have cited, it is my understanding from reading the case that the *mandamus* was granted because the trial court gave the Plaintiffs access to two of the Ford Motor Company databases. That ruling is easily distinguishable from the request that Rick and I have made in this case. Therefore, I believe that opinion does not stand for the proposition that the Plaintiffs are not entitled to certain electronic data.



Kate Hortberg Fax
December 14, 2006
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Please let me know your response.

My best regards,

BEASLEY, ALLEN, CROW,
METHVIN, PORTIS & MILES, P.C.

MICHAEL J. CROW

MJC/anc

Enclosure

CC: Rick Drummond **VIA TELEFAX (251) 650-1264**

Search Results

File Edit View Favorites Tools Help



Search

Folders

Address **Search Results****Other Places**

Desktop

My Computer

My Documents

My Network Places

Details**Search Results**

System Folder

Name	In Folder	Size	Date Modified
1047403.doc	\mike-crow\c\$\Shadow	25 KB	10/14/2004 10:59 AM
1218182.doc	\mike-crow\c\$\Shadow	29 KB	11/8/2004 9:19 AM
1279301.doc	\mike-crow\c\$\Shadow	21 KB	3/16/2006 1:58 PM
128151 In Folder: \mike-crow\c\$\Shadow	\mike-crow\c\$\Shadow	30 KB	12/27/2004 11:18 AM
Type: Microsoft Word Document	\mike-crow\c\$\Shadow	23 KB	5/24/2006 9:46 AM
Size: 29.0 KB	\mike-crow\c\$\Shadow	32 KB	11/9/2004 10:48 AM
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